UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

JOHN DEUTSH, Plaintiff,	§ 8
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v	§ CIVIL ACTION NO. 1:15-CV-490-LY
	§ — — — —
ROY HENRY,	§
Defendant	§

DEFENDANT'S INITIAL DISCLOSURES

Defendant, through his attorney, pursuant to Federal Rule of Civil Procedure 26(a)(1), respectfully submits the following disclosures:

1. Witnesses. The name, address, and telephone number of each individual likely to have discoverable information—along with subject of that information—that the disclosing party may use to support its claims of defenses.

John Deutsh, also known as Jon R. Deutsh Address and phone number unknown Subject matter of information: Plaintiff's alleged visit to Taqueria Los Jaliscienses

Roy Henry 9506 Doliver Dr. Austin, TX 78748 (512) 280-3322

Subject matter of information: Ownership of 1815 W. Ben White Blvd., Austin, TX 78704 and matters relating to ownership thereof

Patricia Macias 1815 W. Ben White Blvd. Austin, TX 78704 (512) 354-0912

Subject matter of information: Condition of 1815 W. Ben White Blvd., Austin, TX 78704

James C. Harrington (Undersigned counsel)

Subject matter of information: Plaintiff's request for attorney's fees

2. Documents and things. Copies, or descriptions by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in

his possession, custody, or control and may use to support his defenses.

None. There are photographs of the parking lot in question in Defendant's possession.

3. Damages computation. A computation of each category of damages claimed by the disclosing party.

Not applicable.

4. Liability insurance. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or indemnify or reimburse for payments made to satisfy the judgment.

Not applicable.

Dated: January 22, 2016

Respectfully submitted,

James C. Harrington Texas Bar No. 09048500

1405 Montopolis Drive Austin, TX 78741 (512) 474-5073 [phone] (512) 474-0726 [fax]

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that on January 26, 2016, I electronically filed the foregoing with this Court using the CM/ECF system, which will send notification of such filing to Plaintiff's counsel, Omar W. Rosales, P.O. Box 6429, Austin, TX 78762.

James C. Harrington